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October 12, 2021

VIA ECF

The Honorable Joan M. Azrack
U.S. District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Werner Mejia Lima v. Paul Napoli and Marie Napoli, No. 19-CV-1699 (JMA)(AKT)

Dear Judge Azrack:

As Your Honor is aware, we represent Defendants-Counterclaimants Paul Napoli and Marie Napoli (“Defendants”) in the above-referenced case. Pursuant to Your Honor’s September 30, 2021 order, the parties jointly submit their proposed summary judgment briefing schedule as follows:

- Defendants’ opening papers served by November 15, 2021;
- Plaintiff’s opposition papers served by December 15, 2021; and
- Defendants’ reply papers served and all papers filed by January 7, 2022.¹

Thank you for Your Honor’s attention to this matter.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

By /s/ Aaron Warshaw

Aaron Warshaw
Jamie Haar

cc: Michael Taubenfeld

¹ The parties will adhere to Your Honor’s “bundling rule” pursuant to Individual Rule IV.F.2.